

**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS
CENTRAL DIVISION**

HEWLETT-PACKARD COMPANY, and
HEWLETT-PACKARD
DEVELOPMENT COMPANY, L.P.,

Plaintiffs,

v.

ICL NETWORK SOLUTIONS (HK),
LIMITED, and C2C TECHNOLOGY,
INCORPORATED,

Defendants.

Civil Action No. 05-40153 FDS

**AFFIDAVIT OF MARGIE D. TERRELL IN SUPPORT OF OPPOSITION
OF PLAINTIFFS HEWLETT-PACKARD COMPANY AND HEWLETT-
PACKARD DEVELOPMENT COMPANY, L.P. TO DEFENDANT ICL
NETWORK SOLUTIONS (HK) LIMITED'S MOTION TO DISMISS FOR
LACK OF PERSONAL JURISDICTION**

I, MARGIE D. TERRELL hereby depose and state as follows:

1. I am the Program Manager for Product Identification and Brand Protection in the Division of Supply Chain, Product and Brand Security at Hewlett-Packard Company. I am employed in Houston, Texas. I make this statement in support of the Opposition of Plaintiffs Hewlett-Packard Company and Hewlett-Packard Development Company, L.P. (collectively, "Hewlett-Packard") to Defendant ICL Network Solutions (HK) LTD's Motion to Dismiss for Lack of Personal Jurisdiction. Except as otherwise indicated in this affidavit, the facts stated herein are known to me of my own personal knowledge and if called upon to do so, I could and would testify thereto.

2. In the course of my duties in the Hewlett-Packard Supply Chain, Product and Brand Security Division, I investigate, track, locate, and identify goods sold by third parties that bear counterfeit marks of Hewlett-Packard. I have worked for several years to implement security labels for Hewlett-Packard's goods, and I am familiar with, among other things, the legitimate hard drives sold bearing Hewlett-Packard's registered trademarks, the type of labeling and coding used by Hewlett-Packard and its suppliers of hard drives, and the ways in which legitimate, authentic goods may differ from goods not manufactured or authorized by Hewlett-Packard.

3. On August 30, 2005, I traveled to Auburn, Massachusetts, to the premises of Worcester County Air Freight, Inc. ("WCAF") at 135 Southbridge Street in Auburn, to inspect certain hard drive units that I understood were being held there. In the course of this inspection, I examined 149 36GB hard drives (HP Part No. 286776-B22) bearing Hewlett-Packard trademarks. All of these 149 units were counterfeit, as detailed in Paragraph 5 of my previous affidavit filed with this Court, Affidavit Of Margie D. Terrell In Support of Plaintiffs' Application for Temporary Restraining Order and Order to Show Cause (filed September 1, 2005).

4. That same day, August 30, 2005, I also examined 56 72GB hard drives (HP Part No. 287778-B22) bearing Hewlett-Packard trademarks (out of a total of approximately 180 such drives bearing Hewlett-Packard trademarks that I understood were present at WCAF). All of these 56 units that I examined were counterfeit, as detailed in Paragraph 6 of my previous affidavit filed with this Court, Affidavit Of Margie D. Terrell In Support of Plaintiffs' Application for Temporary Restraining Order and Order to Show Cause (filed September 1, 2005).

5. Contemporaneously with my inspection of the 149 36GB hard drives (HP Part No. 286776-B22) and the 56 72GB hard drives (HP Part No. 287778-B22) on August 30, 2005, I recorded the serial number of each of the hard drives I inspected. A true and correct copy of a spreadsheet containing the serial numbers of the hard drives I inspected at WCAF on August 30, 2005 is attached hereto as Exhibit A.

Signed under the pains and penalties of perjury that the foregoing is true and correct this
____ day of October ____, 2005

 10 OCT 05
MARGIE D. TERRELL

Part number	UPC	JAN	Serial No.	ct	Comments	Security Label
286713-B22			7302LS421F	25A24046CP8AQF	CT read 25A24046CP8AQF	
286713-B22			7363LSH11D	25A2446CP0UD	Date code 145043	
286713-B22			7405LSH11D	25A2446CP1KG		Blue with fake pink TC
286713-B22			7367LSH11D	25A2446CP2ET		Blue with fake pink TC
286713-B22			7369LSH11D	25A2446CP337		Blue with fake pink TC
286713-B22			7417LSH11D	25A2446CP338		Blue but no fake pink TC
286713-B22			7411LSH11D	25A2446CP37D		
286713-B22			7387LSH11D	25A2446CP4FV		
286713-B22			7399LSH11D	25A2446CP5DJ		
286713-B22			7368LSH11D	25A2446CP68X		Blue but no fake pink TC
286713-B22			7155LSH11D	25A2446CP812		Blue with fake pink TC
286713-B22			7137LSH11D	25A2446CP812		
286713-B22			7154LSH11D	25A2446CP812		
286713-B22			707FLSH11D	25A2446CP812		
286713-B22			707JLSH11D	25A2446CP812		
286713-B22			7144LSH11D	25A2446CP812		
286713-B22			7133LSH11D	25A2446CP812		
286713-B22			7344LSH11D	25A2446CP8204		Blue but no fake pink TC
286713-B22			7337LSH11D	25A2446CP8205	Read 254a2446cp205	Blue but no fake pink TC
286713-B22			7328LSH11D	25A2446CP8205		
286713-B22			7315LSH11D	25A2446CP8207		
286713-B22			7327LSH11D	25A2446CP8208		
286713-B22			7319LSH11D	25A2446CP8210		
286713-B22			7321LSH11D	25A2446CP8210		
286776-b22			7282LSH11D	25A2446CP8213		Blue with fake pink TC
286713-B22			7283LSH11D	25A2446CP8214		
286713-B22			7320LSH11D	25A2446CP8215		
286713-B22			7325LSH11D	25A2446CP8216		
286713-B22			7333LSH11D	25A2446CP8219		
286713-B22			7253LSH11D	25A2446CP8219		
286713-B22			7334LSH11D	25A2446CP8219		
286713-B22			7303LSH11D	25A2446CP8226		
286713-B22			7335LSH11D	25A2446CP8227		
286776-b22			7329LSH11D	25A2446CP8230		
286713-B22			7323LSH11D	25A2446CP8231		
286713-B22			7313LSH11D	25A2446CP8233		
286713-B22			7317LSH11D	25A2446CP8234		Blue with fake pink TC
286713-B22			7330LSH11D	25A2446CP8235		
286713-B22			7332LSH11D	25A2446CP8236		
286713-B22			7316LSH11D	25A2446CP8240		
286776-b22			7301LSH11D	25A2446CP8242		
286713-B22			7302LSH11D	25A2446CP8243		
286713-B22			7312LSH11D	25A2446CP8247		
286713-B22			7254LSH11D	25A2446CP8248		
286713-B22			7308LSH11D	25A2446CP8249		
286713-B22			7165LSH11D	25A2446CP89K		Blue with fake pink TC
286713-B22			7067LSH11D	25A2446CP89M		Blue with fake pink TC
286713-B22			7068LSH11D	25A2446CP89M		Blue with fake pink TC
286713-B22			7116LSH11D	25A2446CP89M		
286776-b22			7143LSH11D	25A2446CP89M	box wouldn't scan	
286713-B22			7118LSH11D	25A2446CP89M		

286713-B22		7081LSH11D	25A2446CP89M	Read 7181LSH11D but scanned else	
286713-B22		7124LSH11D	25A2446CP89M		
286713-B22		707DLSH11D	25A2446CP89M		
286713-B22		7383LSH11D	25A2446CP8A0J		
286713-B22		7401LSH11D	25A2446CP8A22	box wouldn't scan	
286776-b22		7385LSH11D	25A2446CP8A450	Should be A50 A450	Blue with fake pink TC
286713-B22		7404LSH11D	25A2446CP8A49		
286713-B22		7388LSH11D	25A2446CP8A4DC	ct read 25a2446cpadc	
286713-B22		7402LSH11D	25A2446CP8A57		
286713-B22		7412LSH11D	25A2446CP8A58		Blue with fake pink TC
286713-B22		7397LSH11D	25A2446CP8A60		
286713-B22		7373LSH11D	25A2446CP8A9H		
286776-b22		7396LSH11D	25A2446CP8AA1		
286713-B22		7370LSH11D	25A2446CP8AA4		
286713-B22		7362LSH11D	25A2446CP8DSA		
286713-B22		706QLSH11D	25A2446CP8DT7		
286713-B22		7132LSH11D	25A2446CP8F00		
286776-b22	6E+11	706TSLH11D	25A2446CP8F45	PN wouldn't scan from box	Blue with fake pink TC
286713-B22		7146LSH11D	25A2446CP8FA4		Blue with fake pink TC
286713-B22		707HLSH11D	25A2446CP8FA5		
286713-B22		7145LSH11D	25A2446CP8FC1		Blue with fake pink TC
286713-B22		7167LSH11D	25A2446CP8FC1		
286713-B22		7122LSH11D	25A2446CP8FC1	Read 254a2446cp8c1	
286713-B22		7125LSH11D	25A2446CP8FC5		
286776-b22		7113LSH11D	25A2446CP8FC6	box wouldn't scan	
286713-B22		7147LSH11D	25A2446CP8FC6		
286713-B22		7080LSH11D	25A2446CP8FC6		
286713-B22		7115LSH11D	25A2446CP8FCC		Blue with fake pink TC
286713-B22		7140LSH11D	25A2446CP8FCC		Blue with fake pink TC
286713-B22		707FLSH11D	25A2446CP8FFF		Blue with fake pink TC
286713-B22		7121LSH11D	25A2446CP8FG5		Blue with fake pink TC
286776-b22		7168LSH11D	25A2446CP8FT6		Blue with fake pink TC
286776-b22		7343LSH11D	25A2446CP8FT6		Blue with fake pink TC
286776-b22		7131LSH11D	25A2446CP8FT6		Blue with fake pink TC
286713-B22		7390LSH11D	25A2446CP8FT6		Blue with fake pink TC
286713-B22		7119LSH11D	25A2446CP8FT6		Blue with fake pink TC
286713-B22		7111LSH11D	25A2446CP8FT6		Blue with fake pink TC
286713-B22		7336LSH11D	25A2446CP8FT6		Blue with fake pink TC
286713-B22		7345LSH11D	25A2446CP8FT6	says 15prm instead of rpm	
286713-B22		7357LSH11D	25A2446CP8FT6		
286713-B22		7348LSH11D	25A2446CP8FT6		
286713-B22		7156LSH11D	25A2446CP8FT6		
286713-B22		7359LSH11D	25A2446CP8FT6	Box had extra tape, but inside was sealed	
286713-B22		7342LSH11D	25A2446CP8FT6		
286713-B22		7141LSH11D	25A2446CP8FT6		
286713-B22		7138LSH11D	25A2446CP8FT6	CT read 25a2446cp8sd	
286713-B22		7356LSH11D	25A2446CP8FT6		
286713-B22		7352LSH11D	25A2446CP8FT6		
286713-B22		7170LSH11D	25A2446CP8FT6		
286713-B22		7148LSH11D	25A2446CP8FT6		
286713-B22		7392LSH11D	25A2446CP8FT6		Blue but no fake pink TC
286713-B22		7166LSH11D	25A2446CP8FT6		

286713-B22			7086LSH11D	25A2446CP8FT6		
286713-B22			7139LSH11D	25A2446CP8FT6		
286713-B22			7081LSH11D	25A2446CP8FT6	Read 7181LSH11D	
286713-B22			7349LSH11D	25A2446CP8FT6		
286713-B22			7350LSH11D	25A2446CP8FT6		
286713-B22			7161LSH11D	25A2446CP8FT6		
286713-B22			7174LSH11D	25A2446CP8FT6		
286713-B22			7149LSH11D	25A2446CP8FT6		
286713-B22			7157LSH11D	25A2446CP8FT6		
286713-B22			7159LSH11D	25A2446CP8FT6		
286713-B22			7110LSH11D	25A2446CP8FT6		
286713-B22			7172LSH11D	25A2446CP8FT6		
286713-B22			7152LSH11D	25A2446CP8FVR		
286713-B22			707KLSH11D	25A2446CP8FVV	Box had chalk marks inside	Blue but no fake pink TC
286713-B22			7353LSH11D	25A2446CP8HB		
286713-B22			706ELSH11D	25A2446CP8HO3		
286713-B22			706WLSH11D	25A2446CP8RG6		
286713-B22			7410LSH11D	25A2446CP91M		
286713-B22			7380LSH11D	25A2446CPBV6		
286713-B22			7354LSH11D	25A2446CPCCN		
286713-B22			7381LSH11D	25A2446CPCG5		
286713-B22			7384LSH11D	25A2446CPD7B		Blue but no fake pink TC
286713-B22			7378LSH11D	25A2446CPDXW		
286713-B22			7395LSH11D	25A2446CPFDC		
286713-B22			7365LSH11D	25A2446CPFH4		
286713-B22			7415LSH11D	25A2446CPHBK		Blue with fake pink TC
286713-B22			7415LSH11D	25A2446CPHBK		Blue with fake pink TC
286713-B22			7407LSH11D	25A2446CPHKP		
286713-B22			7361LSH11D	25A2446CPHVC	box wouldn't scan	
286713-B22			7382LSH11D	25A2446CPK48		
286713-B22			7413LSH11D	25A2446CPKL3		
286713-B22			7351LSH11D	25A2446CPKMS		
286713-B22			7394LSH11D	25A2446CPPHN		
286713-B22			7416LSH11D	25A2446CPRFV		
286713-B22			7376LSH11D	25A2446CPS5R		
286713-B22			7377LSH11D	25A2446CPTGH		
286713-B22			7366LSH11D	25A2446CPTTB		
286713-B22			7409LSH11D	25A2446CPVGU		
286776B22	6E+11	4.948E+12	70AELR812N	263AC015501040	no logo tape, previously opened and no doc. Rig	Blue with fake pink TC
286776B22			70R6LR8133	263AC015501139		No logo tape
286778-B22			74C4LR928A	CT: 27B4C01H1R9DG4		
286778-B22			74CELR928A	CT: 27B4C01H1R9DGE	Logo tape looks much different and the others	
286778-B22			74CGLR928A	CT: 27B4C01H1R9DGG		midnight blue
286778-B22			74CNLR928A	CT: 27B4C01H1R9DGN		
286778-B22			74CPLR928A	CT: 27B4C01H1R9DGP		midnight blue
286778-B22			74AKLR928A	CT: 27B4C01H1R9DHK		
286778-B22			74ATLR928A	CT: 27B4C01H1R9DHT		
286778-B22	6E+11	4.948E+12	74E0LR928A	CT: 27B4C01H1R9DJB		midnight blue
286778-B22			746FLR928A	CT: 27B4C01H1R9DJE		
286778-B22			746VLR928A	CT: 27B4C01H1R9DKP		
286776-b22			702HLSJ13F	CT: 27B4C01H1R9FDG	p/n: 286774-006	midnight blue
286778-B22			701XLSJ13F	CT: 27B4C01H1R9FDH		

286778-B22	702MLSJ13F	CT: 27B4C01H1R9FDL		
286778-B22	700SLSJ13F	CT: 27B4C01H1R9LBR		
286778-B22	7016LSJ13F	CT: 27B4C01H1R9LC5		
286778-B22	701FLSJ13F	CT: 27B4C01H1R9LCE		
286778-B22	701ULSJ13F	CT: 27B4C01H1R9LCS		
286778-B22	701ZLSJ13F	CT: 27B4C01H1R9LCY		
286778-B22	7061LSJ13F	CT: 27B4C01H1RGQJ1		Midnight blue
286778-B22	7062LSJ13F	CT: 27B4C01H1RGQJ2		
286778-B22	7063LSJ13F	CT: 27B4C01H1RGQJ3		
286778-B22	7067LSJ13F	CT: 27B4C01H1RGQJ7		
286778-B22	7069LSJ13F	CT: 27B4C01H1RGQJ9		
286778-B22	706FLSJ13F	CT: 27B4C01H1RGQJF		
286778-B22	706GLSJ13F	CT: 27B4C01H1RGQJG		
286778-B22	706HLSJ13F	CT: 27B4C01H1RGQJH		
286778-B22	706JLSJ13F	CT: 27B4C01H1RGQJJ		
286778-B22	706NLSJ13F	CT: 27B4C01H1RGQJN		
286778-B22	7037LSJ13F	CT: 27B4C01H1RGQL9		
286778-B22	703CLSJ13F	CT: 27B4C01H1RGQLC		
286778-B22	703MLSJ13F	CT: 27B4C01H1RGQLL		
286778-B22	703VLSJ13F	CT: 27B4C01H1RGQLU		
286778-B22	7041LSJ13F	CT: 27B4C01H1RGQN1		
286778-B22	7045LSJ13F	CT: 27B4C01H1RGQN5		
286778-B22	7046LSJ13F	CT: 27B4C01H1RGQN6		
286778-B22	7049LSJ13F	CT: 27B4C01H1RGQN9		
286778-B22	704ALSJ13F	CT: 27B4C01H1RGQNA		Most Sec labels will not scan
286778-B22	704DLSJ13F	CT: 27B4C01H1RGQND		
286778-B22	704FLSJ13F	CT: 27B4C01H1RGQNF		
286778-B22	704GLSJ13F	CT: 27B4C01H1RGQNG		
286778-B22	704JLSJ13F	CT: 27B4C01H1RGQNJ		midnight blue
286778-B22	704MLSJ13F	CT: 27B4C01H1RGQNM		
286778-B22	704SLSJ13F	CT: 27B4C01H1RGQNS		
286778-B22	704VLSJ13F	CT: 27B4C01H1RGQNV		
286778-B22	7051LSJ13F	CT: 27B4C01H1RGQP1		
286778-B22	7052LSJ13F	CT: 27B4C01H1RGQP2		
286778-B22	7054LSJ13F	CT: 27B4C01H1RGQP4		
286778-B22	7055LSJ13F	CT: 27B4C01H1RGQP5		56
286778-B22	7057LSJ13F	CT: 27B4C01H1RGQP7		
286778-B22	705JLSJ13F	CT: 27B4C01H1RGQPJ		
286778-B22	705LLSJ13F	CT: 27B4C01H1RGQPL		
286778-B22	705DLSJ13F	CT: 27B4C01H1RGUJD		midnight blue
286778-B22	704XLSJ13F	CT: 27B4C01H1RGUJJ		
286778-B22	705CLSJ13F	CT: 27B4C01H1RGUJL		
286778-B22	705HLSJ13F	CT: 27B4C01H1RGUJQ		
286778-B22	705XLSJ13F	CT: 27B4C01H1RGUJX		
286778-B22	704TLSJ13F	CT: 27B4C01H1RGUJZ		
286778-B22	7043LSJ13F	DPN:3R-A3847-AA		
286776-b22	6E+11 4.948E+12	286713-B22 scans from barcode		Blue with fake pink TC
286776-b22	7247LSH11D			Blue with fake pink TC
286776-b22	7246LSH11D			Blue with fake pink TC
286776-b22	7414LSH11D			Blue with fake pink TC
286776-b22	7300LSH11D			Blue with fake pink TC